

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

GEORGE HOEY MORRIS,)
PLAINTIFF)

VS.)

HON. SUSAN JAMES,)
HON. J. CARLTON TAYLOR,)
HON. SUSAN R. REDMOND,)
DEFENDANTS.)

DEBRA P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

CASE NO.: 2:07CV1059-WKW

COMPLAINT

COMES NOW the Plaintiff, George Hoey Morris, appearing *pro se* before this Court and makes the following Complaint:

JURISDICTION

Jurisdiction is appropriate in the Middle District of Alabama because the acts or omissions occurred during procedure in the Middle District of Alabama Judicial System.

VENUE

Venue is appropriate in the Middle District of Alabama because the acts or omissions occurred during procedure in the Middle District of Alabama Judicial System.

COUNT ONE

Plaintiff George Hoey Morris describes the Complaint in the first person below:

1. That I hired Hon. Susan James (hereinafter referred to as James) to handle sentencing and appeal of seven (7) federal convictions for a total fee of fifteen thousand (\$15,000.00) dollars. I paid thirteen thousand (\$13,000.00) dollars leaving a balance due of two thousand (\$2,000.00) dollars. James created the contract that called for a maximum charge of fifteen thousand (\$15,000.00) dollars for sentencing and appeal of all

seven cases and accepted three (3) payments over a period of three months leaving a balance due of two thousand (\$2,000.00) dollars.

2. That James had a credible and competent plan to win my appeal and that I have confidence in that plan. She is also aware of the many flaws and problems associated with my convictions.

3. That I went before Hon. Judge L. Scott Coogler for sentencing and was informed at that time by James that she would no longer represent me in my appeal because to do so would cause her to violate Alabama state ethics and Federal law. James then declared in open court that she could be in violation of ethics or law causing Hon. Coogler to excuse prosecution and spectators for a "sealed hearing". After the hearing, the crowded courtroom resumed open Court leaving the impression among spectators that James would be in violation of the law by representing me.

4. That James informed me that she had a conversation with District Attorney Hon. Susan R. Redmond (hereinafter referred to as Redmond) during which Redmond informed James that she could be in violation of the law by possessing the book I authored entitled virginbride.net.

5. That virginbride.net contains no illegal photography nor is its possession a violation of the law. Despite this fact, James was dismissed as my counsel on the basis of her potential exposure to criminal liability. James' belief that she could be in violation of ethics or the law is based on the conversation she had with Redmond.

6. That virginbride.net was seized by Covington County authorities on the premise that it contained child pornography and a grand jury determined that it did not.

7. That despite Redmond's knowledge that virginbride.net is a legal publication; she maintains that it is not.

8. That during my criminal trials Redmond refused to stipulate the publication was legal causing uncertainty and doubt among jurors thereby affecting the outcome of the trial by making acquittal more difficult to obtain (the book was entered into evidence over my objections and without the requested stipulation the book was legal.)

9. That I hired Hon. J. Carlton Taylor (hereinafter referred to as Taylor) prior to my hiring of James.

10. That Taylor was aware of my arrest in Texas with a false Alabama Attorney General (AAG) warrant by lead investigator Thomas Coram, Jr. and failed to bring this to the attention of the Court.

11. That Taylor was aware of my arrest with a false AAG warrant for forgery after signing my own name. Taylor is also aware that the false AAG warrant was removed from the records and replaced with a county warrant. He has neglected to bring this to the attention of the Court.

12. That Taylor filed a complaint with AAG director Troy King only after numerous complaints from me over a period of two (2) years and refuses to follow through by insisting on a resolution of my claim. That claim remains "under investigation" despite ample evidence and Taylor allows it to remain that status through his inaction.

13. That Taylor is aware of my arrest while driving to that forgery AAG complaint hearing (without a warrant) and the following criminal substitution of vital records from the files and refused to push my complaint. In this case, a handwritten

rambling narrative written after my arrest was removed and later replaced with a back dated warrant. I have copies of both.

14. That Taylor is aware of my arrest without a warrant after leaving the office of Hon. Jennifer Hart by associates of Thomas Coram, Jr. in an attempt to cause my violation of electronic monitoring. Taylor refuses to bring this easily provable infraction of the law to light.

15. That all of these arrests (22 arrests) are connected with my federal charges in view of the fact that they were orchestrated by lead investigator Thomas Coram, Jr. These rapid arrests were based on false allegations by Mr. Coram and designed to place me in custody making defense difficult.

16. That Taylor is aware of the false allegations, misrepresentations and outright perjury by Thomas Coram, Jr. during my detention hearing and refuses to bring this to the attention of the Court.

17. That Taylor refuses to push my agenda regarding these claims and I have lost all confidence in his abilities as an attorney. I have already removed him as counsel on the state cases. I want Taylor off my cases.

18. That Redmond wants Taylor (and not James) to handle my appeal and she threatened James in a deliberate and successful effort to cause James to withdraw from my defense.

19. That James has not refunded any of the fees and remains paid in full (less \$2,000.00) for the appeals of seven convictions. The claim that James could be in violation of laws or ethics is false and does not constitute a valid reason to withdraw from my case.

20. That it is a miscarriage of justice to force me to retain an attorney whom I fired and relinquish an attorney whom I hired as a method of insuring the failure of my appeals.

21. That Redmond's office sent out questionnaires to my relatives and friends asking about their relationship with me and demanding (under penalty of legal action) information about personal income and private affairs causing my relatives and friends to become apprehensive and to withdraw from helping me with my appeal.

WHEREFORE, the above premises considered, Plaintiff prays this Court provide the following remedies:

A. Order Redmond to stipulate that the publication virginbride.net is legal. This would remove widespread perception that I have manufactured child pornography and am deserving of any punishment. Such an order would clear the way for a fair assessment of appeal issues.

B. Order Taylor to resign as my counsel and refrain from further work on my case. I do not want him connected in any way to my case. Redmond wants him to be my attorney.

C. Order an extension of time for the completion of an appeal to allow for time lost since sentencing. Taylor has not even begun preparation for any appeal despite the many months since sentencing. He did not properly represent me during trial and will not properly represent me in appeal.

D. Order James to complete the work she has been contracted and paid to do: represent me in my appeals. She resigned on the basis of a flawed complaint. She would not in fact be in violation of ethics or the law with her continued representation of me in

my appeal. To force me to proceed in my appeal with an attorney I do not want would be manifest injustice. I have contracted and paid Hon. Susan James. She is my attorney.

01 DEC 2007
Date

George Hoey Morris
George Hoey Morris

STATE OF ALABAMA
COUNTY OF MONTGOMERY

BEFORE ME personally appeared George Hoey Morris; who, after being placed under oath, did affix his signature to the foregoing instrument.

December 1, 2007
Date

Lisa Hampton Davis
Notary Public

Lisa Hampton Davis
Notary's printed name

March 17, 2009
My Commission Expires

(SEAL)

CERTIFICATE OF SERVICE

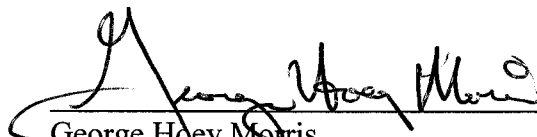
I HEREBY CERTIFY that a true and correct copy of this instrument has been provided to the following by placing a copy of same in U.S. Mail postage prepaid and properly addressed as follows:

Hon. Susan James
P.O. Box 198
Montgomery, AL 36101

Hon. J. Carlton Taylor
5748 Carmichael Pkwy.
Montgomery, AL 36117

Hon. Susan Redmond
P.O. Box 197
Montgomery, AL 36101

01 Dec 2007
Date



George Hoey Morris

